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L.L.P.

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY
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555 THIRTEENTH STREET, NW
WASHINGTON, DC 20004-1109
TEL (202) 637-5600
FAX (202) 637-5910

March 25, 1998

BY HAND DELIVERY

Ms. Magalie R. Salas, Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

Re: Petition for Rule Making to FM Table of Allotments

Dear Ms. Salas:

On behalf of Citicasters Co., enclosed for filing is an original plus four copies of a petition for rule making to amend Section 73.202, Table of Allotments, FM Broadcast Stations.

If any questions arise in connection with this submission, please contact the undersigned.

Respectfully submitted,

HOGAN & HARTSON L.L.P.

By: Cindy D. Jackson
Marissa G. Repp
Cindy D. Jackson

Attorneys for Citicasters Co.

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MAR 25 1998

**Before the
Federal Communications Commission
Washington, D.C. 20554**

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of Section 73.202,) RM- _____
Table of Allotments,)
FM Broadcast Stations.)
(Casper, Wyoming))

To: Chief, Allocations Branch

PETITION FOR RULE MAKING

Pursuant to Section 1.401 of the Commission's Rules, Citicasters Co. ("Citicasters"), by its attorneys, hereby respectfully petitions the Commission to institute a rule making proceeding to amend the Commission's Table of Allotments for FM Broadcast Stations (Section 73.202 of the Commission's Rules) to add Channels 228C1, 243C1 and 263C1 to Casper, Wyoming, as its eighth, ninth and tenth FM allotment. In support of this proposal the following is shown:

1. Citicasters is in the business of building and operating radio stations and desires to provide additional local service to Casper, Wyoming, and the surrounding area.

2. As demonstrated in the three Engineering Statements attached hereto, and incorporated herein by this reference, Channels 228C1, 243C1 and

263C1 may be assigned to Casper, Wyoming, in full accordance with the Commission's Rules and without any other alteration to the FM allocation table.

3. Casper, Wyoming, has several commercial FM allotments and has previously been determined to qualify as a community for allocation purposes.

4. The proposed reference point for Channels 228C1, 243C1 and 263C1 is 42° 44' 03"N - 106° 20' 00"W. This reference point is in full compliance with Section 73.207 of the Commission's Rules.

5. Since the proposed allocations would provide Casper, Wyoming, with additional service, and contribute to the fair and efficient distribution of FM allocations, the instant proposal would be in the public interest.

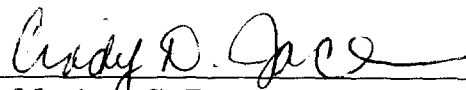
6. As set forth in the attached declaration, Citicasters intends to apply for construction permits for Channels 228C1, 243C1 and 263C1 upon adoption of this proposed rule making, and if awarded permits, to promptly construct and operate such facilities.

For the reasons stated above, Citicasters respectfully requests that the Commission adopt the instant petition, and amend the FM Table of Allotments as shown below.

<u>Community</u>	<u>Channels</u>	
	<u>Present</u>	<u>Proposed</u>
Casper, Wyoming	233C, 238C, 247A, 273A, 279C, 284A, 295C	228C1, 233C, 238C, 243C1, 247A, 263C1, 273A, 279C, 284A, 295C

Respectfully submitted,

CITICASTERS CO.

By: 
Marissa G. Repp
Cindy D. Jackson

HOGAN & HARTSON L.L.P.
555 13th Street, N.W.
Washington, DC 20004-1009
(202) 637-5600

Its Attorneys

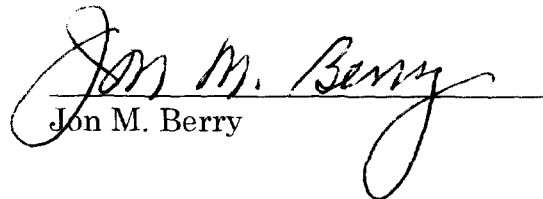
March 25, 1998

Declaration of Jon M. Berry

I, Jon M. Berry, declare as follows:

1. I am Senior Vice President of Citicasters Co. ("Citicasters").
2. Citicasters intends to apply for construction permits for Channels 228C1, 243C1 and 263C1 upon adoption of the proposed rule making amending Section 73.202, Table of Allotments, FM Broadcast Stations (Casper, Wyoming).
3. If awarded the construction permits for Channels 228C1, 243C1 and 263C1, Citicasters will promptly construct and operate such facilities.

I hereby declare under penalty of perjury that the statements made in this declaration are true and accurate to the best of my knowledge, information and belief.


Jon M. Berry

Executed this 24th day of March, 1998.

JAMES B. HATFIELD, PE
BENJAMIN F. DAWSON III, PE
THOMAS M. ECKELS, PE
STEPHEN S. LOCKWOOD, PE

PAUL W. LEONARD, PE
CHRISTIANE ENSLOW REYES
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AUSTRALIA

ENGINEERING STATEMENT

PETITION FOR RULEMAKING TO AMEND
SECTION 73.202 OF THE RULES
AND REGULATIONS OF THE FEDERAL
COMMUNICATIONS COMMISSION
TO ASSIGN FM CHANNEL 228C1
FOR USE AT CASPER, WYOMING

CITICASTERS CO.

3/98

ENGINEERING STATEMENT

This Engineering Statement has been prepared on behalf of Citicasters Co., in support of a Petition for Rulemaking to revise §73.202 of the Commission's Rules to assign channel 228C1 for use at Casper, Wyoming.

The attached computerized channel study demonstrates that channel 228C1 can be assigned for use at Casper in complete compliance with the Commission's applicable Rules and Regulations regarding the requisite spacing between co-channel and adjacent channel stations and allotments. The site used for the accompanying channel study is the licensed site of KMGW(FM) as authorized in BLH-790130AD. The KMGW site is located 14.8 kilometers north of central Casper. The attached map demonstrates that operation with class C1 facilities from the KMGW site would provide 70 dBu coverage the city of Casper.

Hatfield & Dawson Consulting Engineers

Seattle, WA

FM SEPARATION STUDY

Job Title :228C1 at Casper, Wyoming

Separation Buffer 100 km

FCC DB Date : 01/22/98

Channel 228C1 (93.5 MHz)

Coordinates : 42-44-03 106-20-00

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
KLGT-1 LIC	Buffalo WY	BLFTB960621TA	225D 92.9	.360 177.0	44-20-50 106-43-25	350.2	181.98 .00	0 BOOST
KTRZ LIC	Riverton WY	BLH841205KR	226C1 93.1	100. 269.0	42-43-10 108-08-41	270.0	148.38 66.38	82 CLEAR
KTCL LIC	Fort Collins CO	BLH960530KA	227C 93.3	100. DA 344.0	40-05-47 104-54-04	157.4 SS	316.48 107.48	209 CLEAR
PADD	Moorcroft WY	RM9077	228A 93.5	.0	44-15-54 104-57-06	32.7	203.50 3.50	200 CLOSE
PADD	Cheyenne WY	RM8940	229A 93.7	.0	41-12-39 104-44-54	141.7	214.22 81.22	133 CLEAR
Site Restriction 9.7km Northeast								
KRAIFM LIC	Craig CO	BLH6997	229C1 93.7	100. 299.0	40-34-35 107-36-29	204.2	262.12 85.12	177 CLEAR
PADD	Rock River WY	RM9044	230A 93.9	.0	41-44-24 105-58-24	164.9	114.37 39.37	75 CLEAR
Alternate Channel								
KTAK LIC	Riverton WY	BLH811221AS	230C1 93.9	50. 290.0	42-43-10 108-08-45	270.0	148.47 66.47	82 CLEAR

** End of separation study for channel 228C1 **

North

pa

+

+

Casper

Do

70 dBu Contour

+N 42 00 00
W 107 00 00

+

Ref. grid: 1 degree

CVR (tm): d: \fm\casper\map

KILOMETERS
20 0 20 40

228C1 City Coverage

HATFIELD AND DAWSON

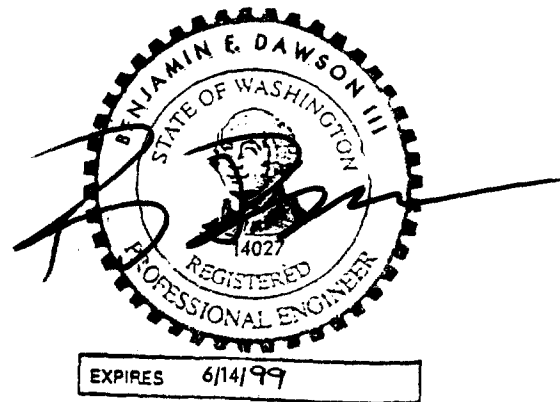
FEBRUARY 1998

Casper, WY

STATEMENT OF ENGINEER

This Engineering Statement has been prepared on behalf of Citicasters Co. All representations contained herein are true to the best of my knowledge. I am an experienced radio engineer whose qualifications are a matter of record with the Federal Communications Commission. I am a partner in the firm of Hatfield and Dawson Consulting Engineers and am Registered as a Professional Engineer in the States of Washington and California.

Signed this 18th day of March, 1998.



Benjamin F. Dawson III, P.E.

Hatfield & Dawson Consulting Engineers

JAMES B. HATFIELD, PE
BENJAMIN F. DAWSON III, PE
THOMAS M. ECKELS, PE
STEPHEN S. LOCKWOOD, PE

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AUSTRALIA

ENGINEERING STATEMENT

PETITION FOR RULEMAKING TO AMEND
SECTION 73.202 OF THE RULES
AND REGULATIONS OF THE FEDERAL
COMMUNICATIONS COMMISSION
TO ASSIGN FM CHANNEL 243C1
FOR USE AT CASPER, WYOMING

CITICASTERS CO.

ENGINEERING STATEMENT

This Engineering Statement has been prepared on behalf of Citicasters Co., in support of a Petition for Rulemaking to revise §73.202 of the Commission's Rules to assign channel 243C1 for use at Casper, Wyoming.

The attached computerized channel study demonstrates that channel 243C1 can be assigned for use at Casper in complete compliance with the Commission's applicable Rules and Regulations regarding the requisite spacing between co-channel and adjacent channel stations and allotments. The site used for the accompanying channel study is the licensed site of KMGW(FM) as authorized in BLH-790130AD. The KMGW site is located 14.8 kilometers north of central Casper. The attached map demonstrates that operation with class C1 facilities from the KMGW site would provide 70 dBu coverage the city of Casper.

Hatfield & Dawson Consulting Engineers

Seattle, WA

FM SEPARATION STUDY

Job Title :243C1 at Casper, Wyoming

Separation Buffer 100 km

FCC DB Date : 01/22/98

Channel 243C1 (96.5 MHz)

Coordinates : 42-44-03 106-20-00

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
K240AT LIC	Gillette WY	BLFT830426MA	240D 95.9	.0	44-12-34 105-28-06	22.8	178.23 .00	0 TRANS
TRANSLATOR FOR KTRS, CASPER, WY.								
KKLX LIC	Worland WY	BLH860602KF	241C2 96.1	50. 116.0	44-04-06 107-51-57	320.7	193.36 114.36	79 CLEAR
KYTI LIC	Sheridan WY	BLH7880	243C3 96.5	25.0 -4.0	44-46-15 106-55-37	348.3	231.28 20.28	211 CLEAR
KQSW LIC	Rock Springs WY	BLH7250	243C 96.5	96. 494.0	41-25-54 109-07-01	238.7	272.00 2.00	270 CLOSE
KXPK LIC	Evergreen CO	BLH940701KC	243C 96.5	100. 530.0	39-40-35 105-29-09	167.9	346.95 76.95	270 CLEAR
NEW APP	Laramie WY	BPH960520MO	244A 96.7	.235 -61.0	41-18-41 105-35-37	158.6	169.50 36.50	133 CLEAR
ALC	Laramie WY	Docket95-159	244A 96.7	.0	41-18-42 105-35-06	158.4	169.73 36.73	133 CLEAR
Effective 4-18-96								
NEW APP	Laramie WY	BPH960520MU	244A 96.7	.440 360.0	41-18-39 105-27-12	155.0	174.09 41.09	133 CLEAR
NEW APP	Laramie WY	BPH960520MJ	244A 96.7	0.55 303.0	41-17-17 105-26-42	155.2	176.69 43.69	133 CLEAR
K244DK APP	Laramie, etc. WY	BPFT970903TE	244D 96.7	.039 457.0	DA 41-13-58 105-26-42	156.0	182.30 .00	0 TRANS
Translator for KCSP, Casper, WY Vertical Polarization Only								
K244DK LIC	Laramie, etc. WY	BLFT940712TB	244D 96.7	.039 457.0	DA 41-13-58 105-26-42	156.0	182.30 .00	0 TRANS
Translator for KCSP, Casper, WY- Vertical Polarization Only								
K244DP LIC	Lander WY	BLFT930907TE	244D 96.7	.135 222.0	DA 42-54-24 108-42-19	276.5	194.93 .00	0 TRANS
Translator For KPGM, Casper, WY- Vertical Polarization Only								

Hatfield & Dawson, Inc.

Page: 2
02/11/98

Seattle, WA

FM SEPARATION STUDY

Job Title :243C1 at Casper, Wyoming

Separation Buffer 100 km

FCC DB Date : 01/22/98

Channel 243C1 (96.5 MHz)

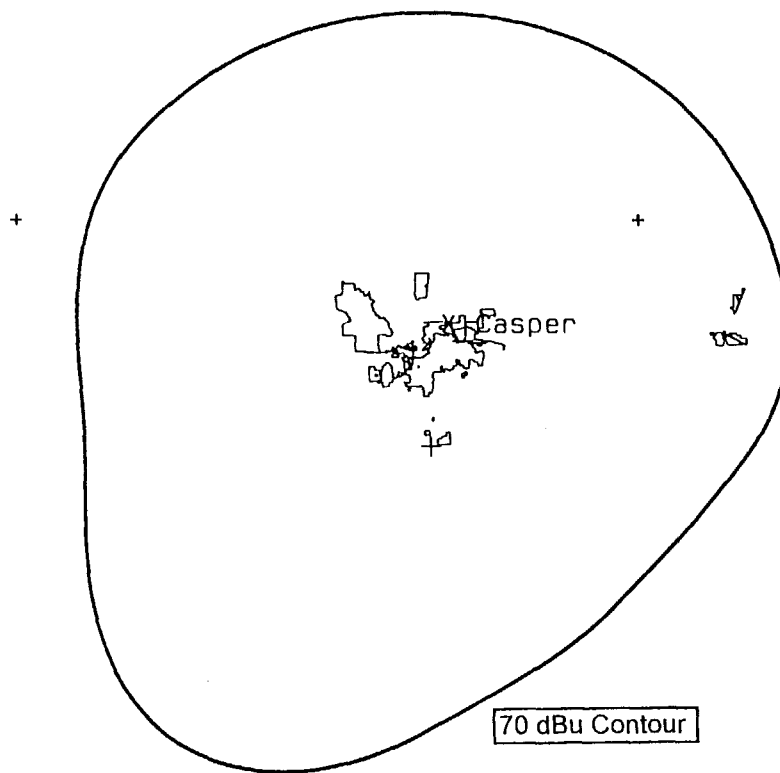
Coordinates : 42-44-03 106-20-00

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
KZMXFM CPM	Hot Springs SD	BMPH960823ID	244C2 96.7	38. 138.0	43-26-34 103-27-27	70.4	247.05 89.05	158 CLEAR
KAMLFM LIC	Gillette WY	BLH890302KD	245C1 96.9	100. 139.0	44-18-10 105-27-00	21.9	188.35 106.35	82 CLEAR

** End of separation study for channel 243C1 **

North

pa



70 dBu Contour

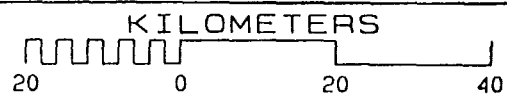
CVR (tm): d: \fm\casper\map

Do

+N 42 00 00
+W 107 00 00

+

Ref. grid: 1 degree



243C1 City Coverage

HATFIELD AND DAWSON

FEBRUARY 1998

Casper, WY

STATEMENT OF ENGINEER

This Engineering Statement has been prepared on behalf of Citicasters Co. All representations contained herein are true to the best of my knowledge. I am an experienced radio engineer whose qualifications are a matter of record with the Federal Communications Commission. I am a partner in the firm of Hatfield and Dawson Consulting Engineers and am Registered as a Professional Engineer in the States of Washington and California.

Signed this 18th day of March, 1998.



Benjamin F. Dawson III, P.E.

Hatfield & Dawson Consulting Engineers

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ENGINEERING STATEMENT

PETITION FOR RULEMAKING TO AMEND
SECTION 73.202 OF THE RULES
AND REGULATIONS OF THE FEDERAL
COMMUNICATIONS COMMISSION
TO ASSIGN FM CHANNEL 263C1
FOR USE AT CASPER, WYOMING

CITICASTERS CO.

3/98

ENGINEERING STATEMENT

This Engineering Statement has been prepared on behalf of Citicasters Co., in support of a Petition for Rulemaking to revise §73.202 of the Commission's Rules to assign channel 263C1 for use at Casper, Wyoming.

The attached computerized channel study demonstrates that channel 263C1 can be assigned for use at Casper in complete compliance with the Commission's applicable Rules and Regulations regarding the requisite spacing between co-channel and adjacent channel stations and allotments. The site used for the accompanying channel study is the licensed site of KMGW(FM) as authorized in BLH-790130AD. The KMGW site is located 14.8 kilometers north of central Casper. The attached map demonstrates that operation with class C1 facilities from the KMGW site would provide 70 dBu coverage the city of Casper.

Hatfield & Dawson Consulting Engineers

Seattle, WA

FM SEPARATION STUDY

Job Title :263C1 at Casper, Wyoming

Separation Buffer 100 km

FCC DB Date : 01/22/98

Channel 263C1 (100.5 MHz)

Coordinates : 42-44-03 106-20-00

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
NEW-T APP	Casper WY	BPFT971014TD	209D 89.7	0.01 839.0	DA 42-44-26 106-21-34	288.4	2.26 .00	0 TRANS
Translator for WPCS, Pensacola, FL- Vertical Polarization Only								
K260AE LIC	Riverton WY	BLFT940601TB	260D 99.9	.052 155.0	DA 43-02-36 108-26-23	282.0	175.48 .00	0 TRANS
Translator For KTRS, Casper, WY								
ALC	Glendo WY	Docket97-23	261A 100.1	.0	42-30-12 105-01-30	103.0	110.37 35.37	75 CLEAR
Effective 8-25-97 per D97-23								
NEW APP	Glendo WY	BPH970925ND	261A 100.1	2. 35.0	42-29-25 105-01-04	103.7	111.30 36.30	75 CLEAR
KZMQFM LIC	Greybull WY	BLH881003KD	262C 100.3	56. 745.0	44-48-41 107-55-06	331.7	263.73 54.73	209 CLEAR
K263AE CP	Rawlins WY	BPFT930510TB	263D 100.5	.019 395.0	DA 41-40-48 107-14-12	212.7	138.85 .00	0 TRANS
Translator for KTRS, Casper, WY- Vertical Polarization Only-Amended 931014								
K263AC LIC	Canyon Valley CO	BLFT941027TA	263D 100.5	.008 460.0	40-27-44 106-51-00	189.8	255.98 .00	0 TRANS
Translator for KIMX, Laramie, WY								
KGWY LIC	Gillette WY	BLH830120AI	264C1 100.7	100. 189.0	44-14-35 105-32-19	20.6	179.55 2.55	177 CLOSE
KOLZ LIC	Cheyenne WY	BLH790806AO	264C1 100.7	100. 149.0	41-06-01 105-00-23	148.4	212.25 35.25	177 CLEAR

** End of separation study for channel 263C1 **

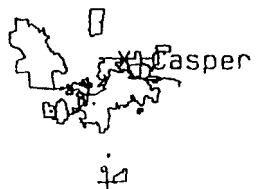
North



90

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+



70 dBu Contour

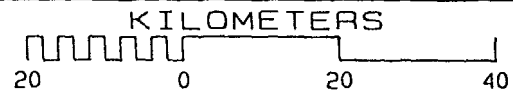
Do

CVR (tm): d: \fm\casper\map

N 42 00 00
W 107 00 00

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Ref. grid: 1 degree



263C1 City Coverage

HATFIELD AND DAWSON

FEBRUARY 1998

Casper, WY

STATEMENT OF ENGINEER

This Engineering Statement has been prepared on behalf of Citicasters Co. All representations contained herein are true to the best of my knowledge. I am an experienced radio engineer whose qualifications are a matter of record with the Federal Communications Commission. I am a partner in the firm of Hatfield and Dawson Consulting Engineers and am Registered as a Professional Engineer in the States of Washington and California.

Signed this 18th day of March, 1998.



Benjamin F. Dawson III, P.E.

Hatfield & Dawson Consulting Engineers